

Exhibit B

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

-----x

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

Case No: 19-cv-08655 (JHR)

-----x

October 2, 2023

9:12 a.m.

Videotaped Deposition of NonParty
Witness PATRICIA FLORISSI, pursuant to Notice,
before CINDY A. AFANADOR, Certified Shorthand
Reporter, Registered Professional Reporter,
Certified Realtime Reporter, Registered Merit
Reporter, NYSRCR, NYSACR and Notary Public of
the State of New York.

**THIS TRANSCRIPT CONTAINS CONFIDENTIAL
PORTIONS DESIGNATED BY COUNSEL**

1 Patricia Florissi

2 after.

3 THE VIDEOGRAPHER: We are going
4 off the record, the time is 12:16 p.m.

5 (Recess taken.)

6 THE VIDEOGRAPHER: We are back on
7 the record, the time is 12:30 p.m.

8 BY MS. GREENE:

9 Q. Ms. Florissi, do you have any
10 visibility into what Mr. Shank is doing on a
11 daily basis?

12 A. No.

13 Q. Do you have any visibility into
14 what Mr. Shank's job requirements are?

15 A. No.

16 Q. Do you know Mr. --

17 A. I -- sorry, I want to clarify
18 that. I work closely with him in several
19 projects and he is also a manager, but I don't
20 have visibility into what he does on a daily
21 basis, no.

22 Q. Do you know what Mr. Shank's
23 qualifications are?

24 A. I know he worked at AWS -- no,
25 Amazon actually, I don't know, he was leading

1 Patricia Florissi

2 gaming, so I don't know if it was AWS or
3 Amazon, I don't know.

4 Q. Do you have insight into what
5 Mr. Penberthy is doing on a day-to-day basis?

6 A. No.

7 Q. Do you know what his
8 qualifications are?

9 A. I do not.

10 Q. Do you have insight into what
11 Mr. Gundi is doing on a day-to-day basis?

12 A. I do not know what he's doing on
13 a day-to-day basis, but I also have other
14 meetings with him that give me some exposure
15 to some of the work that he's doing.

16 Q. And the work that he's doing, is
17 it similar in any way to the work that you are
18 doing?

19 A. No. Well, let me qualify that.
20 He operates, he has contacts with -- as equity
21 of ZNI (phonetic) companies and he is working
22 very closely on this strategy, so it's much
23 broader than what I do.

24 Q. Do you know what his
25 qualifications are?